charles FRAUD

Expose Truth.Fight Injustice.Demand Action.

Client Central - (344709044) **For Internal Use Only**
Customer Name: , Customer ID: 344709044

Original Message by Crystal [redacted]
Created: 04/04/2018 10:34 AM ET
Expires: Permanent

CVRC -DAVID PITLOR Added to Bridger Hotlist and FraudFinder Hotlist. For questions call CVRC @ 877-239-1163

Publicly, Schwab denied that fraud occurred in my account... Secretly, they blamed me for it.

Until Schwab turned over this evidence in 2023, I was completely unaware that I had been added to these fraud "Hotlists." Schwab has always maintained, publicly, that no fraudulent activity occurred in my account, but they were certainly aware of malfeasance. They contrived a scheme to blame me, secretly. And it worked:

- As shown above, on April 4, 2018, just days after the Futures account was supposedly "closed," internal memos show that Plaintiff was added to Schwab's "Bridger Hotlist" and "FraudFinder Hotlist." The designation is specified to be "Permanent" with no expiration.
- Another request to add me to the Hotlists occurred on June 18, 2018—six weeks after Schwab had officially terminated their business relationship with me. Meanwhile, in May- June 2018, they also insisted in court filings (and ever since) that my allegations of fraud were baseless and implausible.

Client Central - (344709044) **For Internal Use Only**
Customer Name: , Customer ID: 344709044

Original Message by Carl [redacted]
Created: 06/18/2018 12:04 PM ET
Expires: Permanent

HOTLIST - Request has been entered asking CVRC to add Mr. Pitlor to Bridger Hotlist and FraudFinder Hotlist. For questions call CVRC @ 877-239-1163

The consequences of being "Hotlisted" continue to be devastating.

Since the "Hotlisting" occurred, I have been completely unable to qualify for loans or credit of any sort. My credit worthiness (and reputation) have been irreparably destroyed:

- I was last approved for credit in April 2018. Since then, I've been uniformly rejected for home loans, credit cards, and even in-store credit accounts.
- My credit reports show a nearly 20-year history with frequent activity and fully paid-off accounts. Put simply, there are no red flags that justify his being permanently disqualified from attaining credit.
- Since it's been so long since he's been approved, his credit score is now "–" (with the label "unscorable.")
- Business opportunities and employment prospects have and continue to be spoiled as a result.

Hotlisting enables "safe harbor" information sharing with other financial institutions.

While the precise nature of the "Fraudfinders" hotlist is unknown, its name seems to imply its purpose: identifying fraudsters

The "Bridger Hotlist" apparently refers the Bridger Insight platform, a comprehensive compliance suite designed by LexisNexis Risk Solutions to optimize compliance with Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) programs as required by the Office of Foreign Assets Control (OFAC), the Bank Secrecy Act, and the USA PATRIOT Act. Bridger Insight is advertised as a tool to:

- "improve[] the identification of potential money-laundering and terrorist financing risks", and to
- "document and defend decisions with transparent audit trails, robust case management and intuitive compliance reporting."

https://risk.lexisnexis.com/products/bridger-insight-xg#bridger

https://risk.lexisnexis.com/insights-resources/case-study/banorte-financial-crime-compliance

Even though the memos are marked "For Internal Use Only," that is rather misleading.

Adding a person to a "Bridger" hotlist established the basis to share "suspected illicit activity" with other financial institutions:

- The USA Patriot Act encourages information sharing for AML and CFT purposes. and provides a safe harbor for registered 314(b) participants. (see more regarding 314(b) information sharing at the bottom of this page)
- The Bridger Insight platform provides the framework to organize and manage data to satisfy regulatory requirements related to 314(b) sharing.
- Even though information shared via 314(b) channels are outside the scope of the Fair Credit Reporting Act (and thus does not appear on Experian, Equifax, or TransUnion credit reports), one of the allowable uses of 314(b) information is "determining whether to maintain an account, or to engage in a transaction."

The timing and repetition of Schwab's hotlist actions support a reasonable inference that Schwab intended the designation to travel beyond internal use, so to shift blame onto me—secretly—to insulate them from culpability for their own systematic failures. While they outwardly declared in public court filings that no fraud occurred and that the errors I'd identified were in fact my delusional misinterpretations (and they have maintained that position ever since) it is clearly incompatible with their "Hotlisting" me behind closed doors.

Section 314(b) provides a safe harbor for good-faith information sharing for AML/CFT purposes, but it does not immunize underlying misconduct. Schwab added me to hotlists (a separate act than the actual "sharing" of information) while representing in court—virtually simultaneously—that no fraud occurred at all. Altogether, the facts and circumstances substantiate a violation of wire-fraud under 18 U.S.C. § 1343 that has resulted in irreperable damages.

- *Section 314(b) of the USA PATRIOT Act provides a safe harbor from liability for voluntary*

information sharing. Banks and broker-dealers may share customer and transaction information with each other if they have a reasonable basis to suspect involvement in money laundering or terrorist financing. (See 31 CFR § 1010.540 - Voluntary information sharing among financial institutions.)

- *LexisNexis markets Bridger Insight® XG as a compliance screening platform with audit trails, case management, and reporting to "maintain regulator-ready compliance" to justify why information was shared, who approved it, and what was used—all aligned with the confidentiality and safeguards expectations that must be met for information sharing under 31 CFR 1010.540(b)(4)(ii).*

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